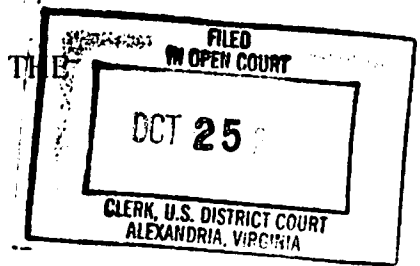


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)

v.)

Criminal No.: 1:12-CR-435-CMH

SUSAN LEE GROSS,)

a.k.a. "Susan Leegross,")

a.k.a. "Ju Mee Lee-Gross,")

a.k.a. "Ju Mee Lee Gross,")

a.k.a. "Ju Mee Lee,")

a.k.a. "Nancy,")

a.k.a. "Coco,")

a.k.a. "Chanel,")

a.k.a. "Beautiful,")

a.k.a. "Sky,")

a.k.a. "Flower,")

a.k.a. "Butterfly,")

Defendant.)

Count One: 18 U.S.C. § 371

(Conspiracy to Transport an Individual for
Purposes of Prostitution and to Entice and
Encourage an Individual to Travel Interstate
for purposes of Prostitution, in violation of
18 U.S.C. §§ 2421 and 2422)

Count Two: 18 U.S.C. § 1956(h)

(Conspiracy to Commit Money Laundering,
in violation of 18 U.S.C. § 1956(a)(1)(A)(i)
and (a)(1)(B)(i))

Forfeiture Notice

CRIMINAL INFORMATION

COUNT ONE

Conspiracy to Transport an Individual and to Entice an Individual to Travel Interstate
(18 U.S.C. § 371)

THE UNITED STATES ATTORNEY CHARGES THAT:

From in and around February 2011 to in and around May 2012, in Fairfax County, in the Eastern District of Virginia, and elsewhere, the defendant, SUSAN LEE GROSS, did unlawfully and knowingly combine, conspire, confederate, and agree with Jin Seob Oh, a woman whose initials are "JSK," and others: to transport an individual in interstate and foreign commerce with intent that such individual engage in prostitution and in any sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Section

2421; and to persuade, induce, and entice an individual to travel in interstate and foreign commerce to engage in prostitution and any sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2422.

(All in violation of Title 18, United States Code, Section 371).

COUNT TWO

Conspiracy to Commit Money Laundering
(18 U.S.C. § 1956(h))

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

From in and around February 2011 to in and around May 2012, in Fairfax County, in the Eastern District of Virginia, and elsewhere, the defendant, SUSAN LEE GROSS, did unlawfully and knowingly combine, conspire, confederate, and agree with Jin Seob Oh, and a woman whose initials are "JSK," to commit the following offenses against the United States:

- a. to knowingly conduct financial transactions affecting interstate and foreign commerce, involving the proceeds of a specified unlawful activity, with the intent that the transactions promote the carrying on of such specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and
- b. to knowingly conduct financial transactions affecting interstate and foreign commerce, and involving the proceeds of a specified unlawful activity, where such transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i),

In both instances, the specified unlawful activity involved was transportation of an individual in interstate commerce for purposes of prostitution and unlawful sexual activity, and the persuasion, inducement, and enticement of any individual to travel in interstate commerce for purposes of

prostitution and unlawful sexual activity, in violation of Title 18, United States Code, Sections 2421 and 2422.

(All in violation of Title 18, United States Code, Section 1956(h)).

Forfeiture Notice

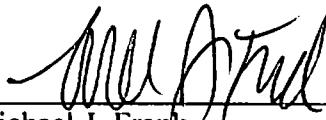
Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, the defendant is hereby notified that, if convicted of the offenses alleged above, she shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1)(C), and Title 28, United States Code, Section 2461(c), all proceeds realized from the offense listed in Count One, and pursuant to Title 18, United States Code, Section 982(a)(1), all property, real or personal, involved in the offense listed in Count Two, including but not limited to the following property:

A cashier's check for \$25,000 in U.S. currency.

Pursuant to Title 21, United States Code, Section 853(p), which is incorporated by Title 18, United States Code, Section 982(b), and Title 28, United States Code, Section 2461(c), the defendant shall forfeit substitute property, up to the value of \$248,409, if, by any act or omission of the defendant, the \$248,409 cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

(In accordance with Title 18, United States Code, Sections 982(a)(6) and (b), Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c), and Rule 32.2(a), Federal Rules of Criminal Procedure.)

Neil H. MacBride
United States Attorney

By: 
Michael J. Frank
Assistant United States Attorney